

IMPORTANT INFORMATION

By providing us with “Personal Data”, you hereby acknowledge and consent to our collection, use, disclosure and/or processing of your personal data in accordance with this Notice. Nothing in this Notice shall vary or supersede the terms and conditions that govern our business relationship with you.

What Is The Purpose For Collecting Personal Data

StoneX Financial Pte. Ltd. (“SFP”) holds a Capital Markets Services license with the Monetary Authority of Singapore (“MAS”) and is required to collect information about yourself and/or in relation to your trading account (“Trading Account”). This information may also be collected or compiled in the ordinary course of our business relationship. Such information may be considered as “personal data” protected under the Personal Data Protection Act (“Act”) of Singapore. The security of your personal data is important to us. SFP has in place safeguards to protect the personal data stored with us. This Data Privacy Notice (“Notice”) describes how we may collect, use, disclose, process, and manage your personal data.

What Personal Data Do We Collect

“Personal Data” is data that can be used to identify a natural person. Some examples of personal data that we may collect include (but is not limited to):

- personal particulars (e.g., name, contact details, residential address, date of birth, identity card/passport details, and/or education details);
- specimen signature(s);
- financial details (e.g., income, expenses, and/or credit history);
- images and voice recordings of our conversations with you if you visit any of our offices or premises, we may have CCTV, which will record your image;
- employment details (e.g., occupation, directorships and other positions held, employment history, salary, and/or benefits);
- tax and insurance information;
- information about your risk profile, investments, investment objectives, knowledge and experience, and/or business interests and assets;
- historical data about the trades and investments you have made including the amount invested;
- trading/banking information (e.g. account numbers and trading/banking transactions); and/or
- personal opinions made known to us (e.g. feedback or responses to surveys).

How Do We Use, Disclose and/or Process Your Personal Data

We may use, disclose and/or process your personal data for any of the following (but is not limited to):

- account opening and operations relating to your account including closing your account;
- providing services and facilities to you from time to time including for the effective execution of any of your transactions;
- administration and/or managing the relationship between us and/or your account;
- introducing brokers with whom we have a mutual relationship;
- conducting credit checks;
- carrying out due diligence or other screening activities (including identity, reference, and background checks) in accordance with legal or regulatory obligations or our internal risk management procedures (including but not limited to those designed to combat financial crime, ‘know-your-customer’, anti-money laundering, counter-terrorist financing or anti-bribery) that may be required by law or that may have been put in place by us;
- enhancing our customer service or developing new services and/or products from time to time;
- processing any applications or requests for new services and/or products made by you;
- training our employees;
- delivering online or e-mail advertising and commercial messages that may be of interest to you under any direct marketing activities undertaken by us;
- risk management, capital management, financial accounting and management reporting purposes;
- enforcing our legal and/or contractual rights against you including but not limited to legal advisers and debt collection agencies;
- where we are required to disclose your personal data by law or when we deem reasonably necessary in order to prevent financial crime or to give effect to the laws governing the relationship between us and/or your account; and
- to relevant local or foreign regulatory authorities, government agencies, statutory boards, supervisory bodies, dispute resolution centers, or revenue authorities, including but not limited to the MAS and the Inland Revenue Authority of Singapore, any relevant securities or futures exchanges, clearing houses, trade repositories, self-regulatory organizations, alternative trading systems or multilateral trading systems.

We will not use, disclose, and/or process your personal data for purposes which are not stated above. Should we wish to use, disclose, and/or process your personal data for a new purpose, we will notify you and seek your prior consent. Where necessary, we may disclose your personal data to third-party service providers and agents (including lawyers/law firms), who may be either within or outside of Singapore for any of the purposes listed above only. We will not disclose your personal data for purposes for which we have not obtained consent. Generally, we require that organizations outside the StoneX group of companies who handle or obtain personal data as third-party service providers and agents to acknowledge the confidentiality of the personal data, undertake to respect an individual’s right to privacy, and comply with the Act and Notice.

Use of Personal Data for Marketing Purposes

We may use your personal data to offer you products or services, including special offers, promotions, contests or entitlements that may be of interest to you or for which you may be eligible. Such marketing messages may be sent to you in various modes including but not limited to electronic mail, direct mailers, short message service, telephone calls, facsimile, and other mobile messaging services. In doing so, we will comply with the Personal Data Protection Act of Singapore (“PDPA”) and other applicable data protection and privacy laws.

Transfer of Personal Data Overseas

In certain circumstances, we may need to transfer your personal data outside of Singapore. Any such transfer of your personal data outside of Singapore will be carried out in accordance with the PDPA. You acknowledge and consent to the transfer of your personal data to other companies within StoneX Group (for information on StoneX group of companies, visit our website at www.stonex.com) as well as third party service providers and agents (including lawyers/law firms) outside of Singapore for one or more of the purposes described above. You are entitled to request details of such transfer from us at any time.

Basis of Consent Granted

Generally, when we request for personal data in the course of providing you a service and/or product and you provide us with such personal data, there is implied consent that you agree to provide us with personal data in order for us to provide you with the requested service and/or product.

In some circumstances and as required by applicable laws, we will seek your express consent when collecting your personal data. For example, where there are new purposes for the use of your personal data, we will seek your fresh consent.

If you do not consent to provide the requisite personal data that we need at the point of application or in the course of maintaining your account(s) with us, we may not be able to open account(s) for you or provide the specific service or product that you require.

We will not sell, rent, or otherwise disclose your personal data to any third party, except in the following circumstances:

- we may share non-personal, non-individual information in aggregate form with third parties for business purposes or we may tell our business partners the number of customers in certain demographic groups or who carried out certain transactions; and/or
- as permitted under the laws of Singapore.

You are entitled to withdraw your consent for the collection of personal data by contacting us. However, this may affect our ability to maintain your account(s) with us.

Right to Access & Correct Personal Data

Under the Act, you have the right to obtain a copy of any personal data which we hold about you and to advise us of any inaccuracy that requires a correction. In addition, you are entitled to know how your personal data has been used or disclosed in the past one year. The Act does set out some exceptions to this. For instance, where the amount of effort and resources needed to provide access would be unreasonable or disproportionate to your interests or if we have satisfied ourselves on reasonable grounds that the correction should not be made.

To make a request, you will need to complete an application form verifying your identity and specifying what data you require. We may charge a reasonable administrative fee for this service to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the personal data sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

We will acknowledge your request within 30-days and respond promptly to it. In exceptional circumstances, we reserve the right to deny you access to your personal data and may provide an explanation as required by applicable laws.

Storage and Retention

Safeguarding the privacy of your personal data is important to us, whether you interact with us personally, by phone, by mail, over the internet or other electronic medium. We hold personal data in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal data we hold from misuse, loss, unauthorized access, modification, or disclosure.

We may need to maintain records containing personal data for a significant period of time, as long as it is necessary to fulfill the purpose for which it was collected, or as required or permitted by applicable laws. We shall cease to retain personal data or remove the means by which the personal data can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that personal data was collected is no longer being served by retention of the personal data and retention is no longer necessary for legal or business purposes. Destruction of records with personal data will be done in a secure manner.

Security Safeguards

We have put in place effective security procedures and technical and organizational measures to safeguard your personal data. We will use all reasonable efforts to safeguard your personal data. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data which is transferred from you or to you via the Internet.

Accuracy of Data

In order to ensure that your personal data is current, complete, and accurate, please update us by contacting us in person at our office or by phone or through mail or e-mail.

We endeavor to ensure that the personal data we hold is accurate and up-to-date. We realize that certain data that we hold about individuals changes more frequently, for example, residential address, phone number and email address, income, savings and net-worth, etc.

We can generally update your personal data over the telephone or at our discretion, will require relevant and reliable documents to verify the amendment(s) that you request.

Contact Us

If you have any comments or questions about this Privacy Notice, please contact us in writing at the address below referencing 'Privacy Notice':

Attention: Data Protection Officer
c/o Compliance Department
STONEX FINANCIAL PTE. LTD.
One Raffles Place
#18-61 Tower 2
Singapore 048616
Email: Compliance.Asia@StoneX.com

Governing Law

Note that as we are a Singapore-registered company, this Privacy Notice has been drafted solely in accordance with the laws of Singapore. We do not represent or warrant that this Privacy Notice complies with the privacy laws of any other jurisdiction and accordingly, you shall not construe this Privacy Notice as such.